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6                   BEFORE THE STATE OF WASHINGTON  
7                   ENERGY FACILITY SITE EVALUATION COUNCIL

8                   IN RE APPLICATION NO. 96-1                   )  
9                   OLYMPIC PIPE LINE COMPANY:                   )  
10                   CROSS CASCADE PIPELINE PROJECT                   )  
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12                   EXHIBIT \_\_\_\_\_ (KC - RT6)  
13                   REBUTTAL TESTIMONY OF KATY CHANEY  
14                   ISSUE: RECREATION  
15                   SPONSOR: OLYMPIC PIPE LINE COMPANY  
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1 **Q. State your name.**

2 A. Katy Chaney

3 **Q. What topics will you address in your rebuttal testimony?**

4 A. My rebuttal testimony is intended to respond to all of the testimony filed concerning  
5 environmental or land use impacts related to the project, and the mitigation of those impacts. My  
6 rebuttal testimony will address the following topics:

7 (1) Olympic's approach to environmental assessment and mitigation;

8 (2) Visual Impacts;

9 (3) Noise Impacts;

10 (4) Geotechnical hazards;

11 (5) Stream Crossings, Water Quality and Water Resources;

12 (6) Fish, Wildlife and Endangered Species

13 (7) Wetlands and Vegetation;

14 (8) Recreation;

15 (9) Land Use, including Agriculture.

16 For the Council's convenience, my rebuttal testimony has been divided into several different  
17 exhibits, organized roughly according to the likely organization of the adjudicatory proceedings.  
18 This exhibit addresses recreation.

19 **Q. Are impacts to recreational users addressed in the Application for Site Certification?**

20 A. Yes, the impacts are described in Section 5.3.1.5, beginning on page 5.3-15. We have included a  
21 table (Table 5.3-10) and map (Figure 5.3-1), which show the public parks and recreation areas in  
22 the vicinity of the proposed pipeline route.

23 **State Parks**

24 **Q. Does the pipeline corridor cross all of the parks included on that list and shown on that**  
25 **map?**

1 A. No. The pipeline corridor crosses only four public parks, the Cedar Falls Trail (managed by  
2 King County), Twin Falls State Park, Ginkgo State Park, and the John Wayne Trail (Iron Horse  
3 State Park). For the Cedar Falls Trail and the John Wayne Trail, the pipeline will be located  
4 entirely within the trail area, and will not require additional clearing.

5 **Q. Do you consider the impacts to recreational users to be temporary or long-term?**

6 A. I consider the impacts to be temporary. In contrast, there will be long term benefits to  
7 recreational trail users in some areas because Olympic will be improving the trail surface as part  
8 of land restoration activities after the pipeline is installed. Olympic will restore the trail surfaces  
9 to King County and State Parks standards, including the size and sharpness of trail surfacing  
10 crushed rock. The construction restoration may help to alleviate some of the problems created by  
11 WorldCom that Mr. Boyer discussed. In the Snoqualmie Tunnel, the pipeline will be placed  
12 entirely below the floor surface to eliminate any visual or safety issues.

13 **Cedar Falls Trail**

14 **Q. How will users of the Cedar Falls Trail be impacted by the proposed project?**

15 A. During the construction phase, portions of Cedar Falls Trail may have to be temporarily closed or  
16 trails re-routed around the active construction area. In other areas, trail users may also be delayed  
17 by construction on the trail rights-of-way for short periods of time. Impacts will last only until the  
18 pipeline is buried and surface soil conditions returned to their original state. No other direct  
19 impacts to public recreational facilities along the pipeline route are anticipated during the  
20 construction phase.

21 **Q. How does Olympic plan to mitigate impacts to the users of the Cedar Falls Trail?**

22 A. Olympic will work with the relevant authorities to minimize and mitigate impacts upon  
23 recreational users. We have been working with King County Open Space to develop signage that  
24 would be posted along the Cedar Falls Trail that would alert trail users of the upcoming  
25 construction schedule, likely periods of trail closures and alternative routing.

**Twin Falls State Park**

**Q. How will recreational users of Twin Falls State Park be impacted by the proposed project?**

A. No campgrounds or developed recreation areas will be crossed in Twin Falls State Park. The majority of the construction within the park area will occur outside of any developed recreational areas. There may be some construction traffic, as it crosses park roadways within the construction corridor, that will be noticed by park users for the short duration of time that construction occurs within the park boundary. Olympic is working with State Parks on a number of project conditions, including the location of parking for construction vehicles, to avoid or minimize impacts to park users.

**Q. Did you review the testimony of Randy Person concerning visual impacts to recreational users in the vicinity of the Twin Falls State Park?**

A. Yes, I agree with Randy's assessment that the pipeline route will not be visible from the Twin Falls Trail and that there will be no recreational or visual impacts to the Twin Falls Trail due to pipeline construction along the proposed pipeline route.

**Ginkgo State Park**

**Q. How will recreational users of Ginkgo State Park be impacted by the proposed project?**

A. No campgrounds or developed recreation areas will be crossed in Ginkgo State Park. The majority of the recreational users of Ginkgo State Park use one of three areas: The Wanapum Campground and day use area to the south of I-90, the Interpretive Center, and the developed trail along the caged specimens of petrified trees, both to the north of I-90, north of Vantage. Visitors to the Interpretive Center and the petrified tree trail access them from I-90 through the business community of Vantage. Pipeline construction will not occur within either of these areas. Campers and day-use users of the Wanapum Recreation Area, access the area from I-90, and then south on Huntzinger Road. Construction will occur to the west of Huntzinger Road and should not interfere with recreational drivers who are accessing the recreational area. The

1 Wanapum Recreation Area is located downslope at some distance from Huntzinger Road, and,  
2 due to the existing vegetation (tall poplar trees) that ring both the campground and the day-use  
3 area, and the steepness of the slope up to the road, it is unlikely that any of the construction will  
4 be visible or audible from the recreation area.

5 **Q. How was the route through the Ginkgo State Park determined?**

6 A. The route was originally laid out to follow natural ridge lines. Olympic has worked with staff  
7 from State Parks to revise the route within the park to utilize an existing unpaved maintenance  
8 road for much of the route.

9 **Q. Have you considered potential visual impacts from construction within the Ginkgo State**  
10 **Park areas?**

11 A. Yes, Figure 5.1-4 of the Application shows a simulated view of pipeline right-of-way through  
12 rangeland. We agree with Mr. Carter's assessment that the area has low rainfall and that  
13 complete revegetation may take several years. We do not, however, believe that the scarring will  
14 be permanently evident.

15 **Q. What will Olympic do if petrified wood is encountered during construction?**

16 A. Olympic has proposed to State Parks that a recovery plan developed prior to the start of  
17 construction. This plan will be much like the Programmatic Agreement to be drafted for cultural  
18 resources, and will include a protocol for identification and collection of specimens by Parks  
19 personnel.

20 **Q. Are there other Dames & Moore witnesses with information concerning Ginkgo State**  
21 **Park?**

22 A. Yes. Geoff Spauling will provide testimony concerning paleontological resources in Ginkgo  
23 Park.  
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**John Wayne Trail**

**Q. How does Olympic plan to mitigate impacts to the users of these recreational facilities?**

A. Olympic will work with the relevant authorities to minimize and mitigate impacts upon recreational users. We have been working with State Parks to develop signage that would be posted along the John Wayne Trail that would alert trail users of the upcoming construction schedule, likely periods of trail closures and alternative routing. Olympic intends to schedule construction in the Snoqualmie Tunnel during periods in which that tunnel is ordinarily closed to recreational use. In the event that construction must take place during a time when the tunnel is ordinarily open to the public, Olympic has proposed to provide transportation for pedestrian and bicycle trail users around the Snoqualmie Tunnel during construction in the tunnel if the construction occurs during a time of year when the tunnel is open to recreationists (usually May to October).

**Q. Are the trail closures you mentioned expected to last for extended periods of time?**

A. No. The trail closures will be for only a few days at most sections. The longest closure would likely be in the Snoqualmie Tunnel where the construction could take four weeks or more. The tunnel, however, is closed during the winter season to recreationists and Olympic will try to schedule the tunnel construction during this period of time.

**Q. Does Olympic intend to widen the John Wayne Trail over the existing width?**

A. No, Olympic plans to work within the existing trail width to minimize any impacts on adjacent vegetation and habitat.

**Q. Will any new trail access points be created?**

A. No, Olympic has committed in its Application to not creating new access points.

**Q. Will Olympic regrade drainage ditches along the trail as part of the trail restoration?**

A. Yes, the ditches will be regraded, and cross-trail culverts restored.

1 **Q. Will the pipeline be attached to any of the bridges along the John Wayne Trail?**

2 A. Yes. In response to other agencies who have requested that existing bridges be used to the  
3 maximum extent feasible to prevent impacts to aquatic resources, Olympic has proposed to  
4 attach the pipeline to some of the bridges along the trail.

5 **Q. Has Olympic done a structural analysis of these bridges to determine whether they are**  
6 **capable of holding the pipeline?**

7 A. For the most part, yes. Olympic had a structural analysis conducted of the bridges that were  
8 identified early on in this process, and that analysis is provided in Appendix B-1 of the  
9 Application. There have recently been some small route revisions that have occurred as a result  
10 of negotiations with other agencies to relocate the pipeline onto additional bridges. Olympic will  
11 complete a structural analysis of those bridges before beginning construction.

12 **Q. Does Olympic recognize the difficulties of constructing along the narrow John Wayne**  
13 **Trail, especially in mountainous areas?**

14 A. Yes, there will be a specialized construction crew for the mountainous area, which includes the  
15 trail. The pace of construction will be determined by weather and site conditions, the timing of  
16 permit issuance, and the need to avoid certain wildlife habitat areas during mating or nesting  
17 times. As much as practical, Olympic will limit the impacts to recreational users.

18 **Q. How does Olympic plan to revegetate areas that are cleared of vegetation as part of the**  
19 **construction?**

20 A. Olympic has committed to revegetating areas as part of the restoration activities. Unless there  
21 are weather concerns, revegetation will occur immediately. We have also prepared noxious weed  
22 control plans that have been reviewed by county noxious weed control boards. The intent of  
23 these plans is to prevent the introduction or spread of noxious weeds along the corridor.

24 **Q. Will long term pipeline maintenance create a need for vehicles to drive along the pipeline**  
25 **route?**

1 A. No, the routine monitoring is done by aerial surveillance and by electronic controls. Areas that  
2 cannot be surveyed by air, such as within the tunnel, would be monitored by pedestrians.

3 **Private Recreational Facilities**

4 **Q. Does the Application also address private recreational facilities?**

5 A. Yes, on page 5.3-15 of the Application. The private recreational facilities include the ski areas at  
6 Snoqualmie Pass, golf courses, campgrounds, school playgrounds and ballfields, museums, movie  
7 theaters, and recreational vehicle parks. The only private recreational facilities that the pipeline crosses  
8 are the Echo Falls Golf Course and the Mt. Si Golf Course. The pipeline is located within the BPA  
9 corridor in the area near the Echo Falls Golf Course, and the BPA transmission lines cross the golf  
10 course itself. The pipeline route has been sited to be located under the golf cart pathway and to avoid  
11 crossing any of the greens. Olympic has obtained an easement from the owners of the Echo Falls Golf  
12 Course for the proposed route across the golf course. The pipeline is routed within the Cedar Falls Trail  
13 In the vicinity of the Mt. Si Golf Course. The trail crosses the golf course and the pipeline will be  
14 located entirely within the trail. Olympic has obtained an easement from Burlington Northern Railroad,  
15 the underlying land owner, for the portion of the trail that crosses the Mt. Si Golf Course.

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17 DATE: March 24, 1999

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